

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Federal-State Joint Board on	)	
Universal Service	)	CC Docket No. 96-45
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337

**US TELECOM REQUEST FOR EXTENSION OF TIME  
TO FILE COMMENTS AND REPLY COMMENTS**

Pursuant to section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, United States Telecom Association (USTelecom) requests that the Commission grant a two-month extension of the date for filing comments, and an additional one-month extension of the date for filing reply comments, on the *Notice of Proposed Rulemaking* in the above-referenced proceeding.<sup>1</sup> The current comment cycle for this proceeding requires initial comments to be filed within thirty days of Federal Register publication, and reply comments to be filed 30 days after initial comments. Thus, comments are currently due on February 10, 2006, and reply comments are due on March 13, 2006. *See* 71 F.R. 1721 (Jan. 11, 2006). The *Notice* raises important and complex issues concerning support for universal service to non-rural carriers. These issues will likely generate a substantial number of comments from carriers, state commissions, and other interested parties. Moreover, the complexity of the subject matter, the procedural history of the issues (before the Commission and the courts), and the 10<sup>th</sup> Circuit's mandate<sup>2</sup> in this matter

---

<sup>1</sup> *See Federal-State Joint Board on Universal Service, High-Cost Universal Service Support, Notice of Proposed Rulemaking*, FCC 05-205 (rel. Dec. 9, 2005) ("*Notice*").

<sup>2</sup> *Qwest Corp. v. FCC*, 398 F.3d 1222 (10<sup>th</sup> Cir. 2005).

make clear that the ordinarily applicable time period for comments and replies will be insufficient for the generation of proper, substantive comments.

The Commission also invites commenters to submit rate data, and to propose methods of analyzing such data. *Notice*, ¶ 22. USTelecom's members have expressed concern about the ability to gather and analyze data, and respond to the numerous questions raised by the *Notice*, within the timeframes given. In addition, USTelecom members are concerned about having enough time to respond to the comments of others.

The extensions of time set forth above would permit the full and informed responses to these issues that are clearly necessary under the circumstances. Further, the time extensions will assist the parties in developing a better record for the Commission's decision.<sup>3</sup> The requested extension of the comment and reply comment cycles would permit a more thorough exploration of the issues and would not prejudice the interests of any party.

---

<sup>3</sup> *See id.* at 1237 (“On remand, the FCC must utilize its unique expertise to craft a support mechanism taking into account all the factors that Congress identified in drafting the Act and its statutory obligation to preserve *and* advance universal service. No less important, the FCC must fully support its final decision on the basis of the record before it.”).

For the foregoing reasons, the Commission should grant a two-month extension of the filing date for comments in this proceeding, to April 10, 2006, and an additional one-month extension for reply comments, to June 10, 2006.

Respectfully submitted,

UNITED STATES TELECOM ASSOCIATION



By \_\_\_\_\_

James W. Olson

Indra Sehdev Chalk

Jeffrey S. Lanning

Robin E. Tuttle

607 14th Street, NW, Suite 400  
Washington, DC 20005-2164  
(202) 326-7300

Dated: January 17, 2006